

Application Serial No. 09/821,041

Attorney Docket No. 52493.000099

**REMARKS**

The May 31, 2005 Office Action has been received and its contents carefully considered. Claims 1-10 and 12-16 are pending in the present application.

For the reasons set forth below, the claims are believed to be in condition for allowance.

**I. THE CLAIMS DEFINE PATENTABLE SUBJECT MATTER**

The Office Action rejects claims 1-10 and 12-16 under 35 U.S.C. §103 as being unpatentable over Brant et al. (U.S. Patent No. 6,714,979) in view of Probert (U.S. Patent No. 6,714,979). This rejection is respectfully traversed. The Examiner is respectfully requested to reconsider the asserted rejection based on the remarks set forth below.

Claim 1 of the present application recites a method for converting a plurality of data files and associated information from a first file format to a second file format comprising the steps of extracting at least one data file from at least one first format file server, wherein the at least one data file includes a first format image portion and a first format work information portion; converting the first format image portion of the at least one data file to a second format image portion; converting the first format work information portion of the at least one data file to a second format work information image portion; creating a second format data file including both the second format image portion and the second format work information image portion; and importing the second format data file into a second format file server. Applicant respectfully submits that Brandt and/or Probert fail to teach or suggest such features.

The teachings of Brandt were discussed in the March 3, 2005 Response. Brandt is directed to a data warehousing infrastructure for a web based reporting tool. In the Abstract, Brandt teaches that a data warehousing infrastructure for telecommunications priced call detail

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data is integrated with a Web/Internet based reporting system providing a common GUI enabling the requesting, customizing, scheduling and viewing of various types of priced call detail data reports. Such an infrastructure performs an extraction process to obtain only those billing detail records of entitled customers, and a harvesting process for transforming the billing records into a star schema format for storage in one or more operational data storage devices.

The Office Action asserts that as to claim 1, Brandt discloses a system with means, method and computer program product, for converting a plurality of data files and associated information from a first file format to a second file format comprising: a) a legacy file server for storing a plurality of legacy data files in a first file format; b) a file extraction program for retrieving the legacy data files as well as associated indexing and work history information from the legacy file; c) the file extraction program further operating to convert the legacy data files and related information into data files meeting a current selected format; d) a conversion verification program for ensuring that the conversion made by the file extraction program is completed without errors; e) a file importing program for importing the newly converted files into a current format file server; and wherein the legacy data files include a first format image.

The Office Action reflects that Brandt did not specifically disclose the file extraction detail processing steps as claimed by applicant. The Office Action asserts, that however, Probert discloses the file extraction program detail processing steps as claimed by Applicant (e.g., Abstract, Fig. 3 and associated texts). The Office Action further asserts that Brandt and Probert are both in the same field to extract and convert a plurality of files stored in an Internet communication environment. The Office Action concludes therefore, it would have been obvious for an ordinary skilled person to apply the well known file extraction processing details

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as disclosed by Probert into Brandt's data extraction system, because by doing so, as suggested by Probert the combined system would dynamically format any application file from one format into another format for faster access and make the system upgrade easier to perform and also allows upgrades to take place in stages, which can be very important for organizations with large numbers of systems; and that furthermore, the Office Action asserts that applications can also embed files in a new context, such as in emails or copying to an offline media, where specific formats are required. (e.g., Probert Jr., col. 4, lines 26-49).

As noted above, the Office Action asserts that Brandt does not specifically disclose the file extraction detail processing steps as claimed by Applicant. The Office Action attempts to cure this asserted deficiency with the teachings of Probert, i.e., by asserting that Probert does indeed teach the file extraction program detail processing steps as claimed by Applicant.

Applicant submits that Probert fails to cure the deficiencies of Brandt. In particular, as was discussed in the March 3, 2005 Response, Brandt is deficient in teaching or suggesting the claimed features relating to *data conversion*. Applicant acknowledged (March 3, 2005 Response at page 12, line 9) that Brandt indeed teaches aspects of *data extraction*. However, the Office Action clearly proposes to modify Brandt based on teachings of Probert related to *file extraction*. Accordingly, the proposed modification of Brandt fails to cure the deficiencies of Brandt dealing with data conversion.

In further explanation of the deficiencies of the applied art, the features of claim 1 relate to both extracting and converting data. Specifically, claim 1 recites: extracting at least one data file from at least one first format file server, wherein the at least one data file includes a first format image portion and a first format work information portion; converting the first format

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image portion of the at least one data file to a second format image portion; converting the first format work information portion of the at least one data file to a second format work information image portion; creating a second format data file including both the second format image portion and the second format work information image portion.

Accordingly, as can be appreciated, the claimed invention sets forth a specific manipulation of data relating to both extracting and converting data. As noted above, Brandt clearly teaches aspects of data extraction. However, it is respectfully submitted that Brandt fails to teach or suggest the claimed features relating to data conversion, so as to teach the claimed invention.

Brandt teaches, in column 42 with reference to Fig. 16, that as indicated at step 832, the DSS receives the request and acknowledges receipt. Specifically, when the request is received it is first validated with StarOE to ensure that the user is entitled to receive information about the selected product. Once the request passes validation, the DSS LAIO reads the header to determine which Data Mart will ultimately be queried. It then parses the metadata into a format which the COTS software can readily convert into a SQL statement, as indicated at step 835, FIG. 16(b), and adds the report to the DSS report queue based upon type (Daily, Weekly, Monthly, Adhoc) and associated DataMart, as indicated at step 638. At this point, the request has been flagged as submitted in the RM database, as indicated at step 633.

Brandt further teaches (column 42, lines 44-65) that, as shown in FIG. 15(b), a Formatter module 395 may perform various report result transformations including: 1) Converting of column headers generated by Information Advantages into appropriate column ids that are recognizable to the StarWRS client viewer functionality (as indicated at step 850, FIG. 16(b)); 2)

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Provide subtotalling for specific requested "subtotal by" columns in the format required by the StarWRS client interface (as indicated at step 853, (FIG. 16(b)) and provides report-based totals as requested by customer; 3) converting binary stream data file to ASCII text file (as indicated at step 855, FIG. 16(c)); 4) implementing Replace logic, e.g., replacement of "TAB" delimiters with appropriate "Comma" field delimiters (as indicated at step 857 FIG. 16(c)); 5) implementing Repeat/Padding logic, i.e., identifying compressed columns/values and decompressing (or repeating) the values that were compressed; 6) providing alphanumeric translations for any encoded data elements returned in the result set data file (as indicated at step 859, FIG. 16(c)); and, 7) adding new computed/derived columns, e.g., percents, averages of column data values, etc., as requested by customers on specific reports.

However, the above disclosures do not teach or suggest the particulars of claim 1. Claim 1, as well as the other independent claims, do not generally recite conversion. Rather, claim 1 recites a specific methodology involving both extraction and conversion, and a specific manipulation of data.

It is respectfully submitted that Brandt fails to teach or suggest such specifics. Further, the proposed modification of Brandt based on Probert's teachings of file extraction fail to cure the deficiencies of Brandt, i.e., since Brandt's deficiencies lie in data conversion, vis-à-vis the claimed invention.

On page 5, lines 7-9, the Office Action asserts that Probert teaches creating a second format data file including both the second format image portion and the second format work information image portion (e.g., Probert: Fig. 3 and associated texts). Applicant respectfully traverses such assertion, and requests the Examiner to clarify the basis of such assertion.

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Fig. 3 of Probert is discussed at column 8, line 60 - column 9, line 66. For example, Probert teaches that Fig. 3 illustrates the conversion at a data structure level. Probert describes that an application 312 utilizes interfaces 314 to access data it thinks is stored in a Windows95® environment at 316. Block 316 indicates an expected file system such as those implemented in Windows95 where files are stored in a docfile format, and a network connection to a WindowsNT® environment where files are stored in native structured storage (NSS) format which is only exposed through OLE32/Stg application program interfaces (APIs). Probert teaches the version of OLE32 at 314 expects to view the data it deals with as if it were stored in a single stream structure storage format (docfile) indicated at 318 consistent with Windows95. The single stream format comprises metadata 320, which includes items like file allocation tables (FAT) which identifies where segments of data, 322, 324 and 326 which are logically connected to comprise application data of file are located on disk. Metadata 320 also may include application specific information such as document profiles and formatting information that OLE32 314 uses, but is not normally seen by the application 312.

In column 9, lines 19-27, Probert further teaches that a dynamic storage format conversion filter at 330 converts between the docfile format view expected by Windows 95/OLE32 and the multi stream structure NSS storage format used on WindowsNT 5.0 by default as represented in blocks 332, 334, 336, 338, 340 and 342. The native structured storage is represented by a block 332 of synthesized metadata, which comprises auxiliary information about the file to aid in quickly converting it to the format desired by the application. Probert describes that pointers and hints about the conversion are kept in streams represented by block 332. It can also include audit trails of file access, such as the identity and time of access to a file,

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and also a record of changes to allow reconstruction of various temporal versions of the file.

However, the above disclosures of Probert do not teach or suggest the particulars of claim 1, even if somehow combined with Brandt. Claim 1, as well as the other independent claims, do not generally recite conversion. Rather, claim 1 recites a specific methodology involving both extraction and conversion, and a specific manipulation of data. It is respectfully submitted that Brandt and/or Probert fail to teach or suggest such specifics.

For at least the above reasons, it is respectfully submitted that claim 1 defines patentable subject matter. Further, independent claims 6 and 11 define patentable subject matter at least for reasons similar to those set forth above with respect to claim 1. Further, the various dependent claims are allowable at least based on their dependencies on the independent claims, as well as for the additional features set forth therein.

## II. CONCLUSION

Applicant respectfully submits that the application, as amended, is in condition for allowance. If the Examiner believes that prosecution might be advanced by discussing the application with Applicants' counsel, in person or over the telephone, we would welcome the opportunity to do so.

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In the event any fees are due, the Commissioner is hereby authorized to charge the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,

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